

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

JOHN PRINCE,)
)
Plaintiff,)
)
v.) Case No.: 5:20-cv-00208-LCB
)
)
HUI HULIAU; DERYL WRIGHT; and)
HOWARD RUSSELL,)
)
Defendants.)

DECLARATION OF STEVEN JOHNSON

I, Steven Johnson, pursuant to 28 U.S.C. § 1746, declare as follows.

1. I am an adult resident of Woodford County, Kentucky. I have personal knowledge of the matters set forth in this declaration, and am competent to testify to them. If called as a witness, I could and would testify under oath to the facts set out herein.

2. I worked for KAYA Associates, Inc. (“KAYA”) from October 2005 to February 2020. I was KAYA’s President from January 2017 to February 2020.

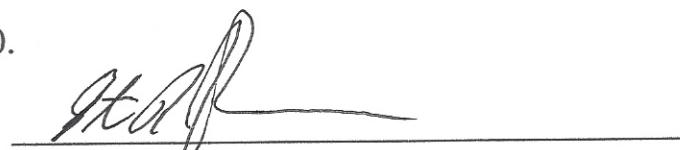
3. On September 6, 2017, Hui Huliau (“H2”) acquired all of KAYA’s stock from Breifne Group, LLC.

4. On the day that H2 acquired KAYA from Breifne (September 6, 2017), H2 caused KAYA to pay a \$200,000.00 fee or commission to an entity called 4P.

5. Following the acquisition, H2 caused KAYA to pay \$20,000.00 per month to 4P as a management fee.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of April, 2020.



Steven Johnson